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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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JUN -6 2003

In the Matter of	)	EB Docket No. 03-96
	)	
NOS Communications, Inc.	)	File No. EB-02-TC-119
Affinity Network Incorporated and	)	
NOSVA Limited Partnership	)	NAL/Acct. No. 20033217003
	)	
Order to Show Cause and Notice	)	FRN: 0004942538
of Opportunity for Hearing	)	

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: Honorable Arthur I. Steinberg  
Administrative Law Judge

**MOTION FOR EXTENSION OF TIME TO RESPOND TO ADMISSIONS REQUEST**

Affinity Network Incorporated, NOSVA Limited Partnership and the principals of NOS Communications, Inc., Affinity Network Incorporated and NOSVA Limited Partnership (collectively, "Movants"), by its attorneys and pursuant to Commission's Rules, 47 C.F.R. § 1.46, moves for an extension of time of 30 additional days to respond to the Enforcement Bureau's May 27, 2003 "Request for Admissions of Facts and Genuineness of Documents" ("Admission Request").<sup>1</sup> In support, the following is shown:

On May 27, 2003, the Enforcement Bureau ("Bureau") served one set of Admissions Request to "NOS Communications, Inc. ("NOS"), Affinity Network Incorporated ("ANI") , and NOSVA Limited Partnership ("NOSVA") and the principals of NOS, ANI and NOSVA." The Admission Request is 88 pages in length, includes 645 separate admission requests, 22

<sup>1</sup> A motion for extension of time, also to July 11, 2003, was filed by NOS Communications, Inc. on May 30, 2003. At footnote two of the motion it was "requested that this date be the response date for all parties upon whom the Admission were served."

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attachments (of which seven are cassette tapes of alleged telephone calls between employees of one or more of the named respondents and past or present customers of one or more of the companies). Attachments to the Admission Request also include some 450 pages of documents as to which the Bureau is requesting admissions of genuineness. For the reasons stated below, Movants request an additional 30 days, to July 11, 2003, to respond, in order to be afforded an opportunity to thoughtfully respond to the Admission Request.

Movants are not able to respond within ten days. Although Movants have made a good faith effort to respond within ten days, it has found that the Admission Request requires consultation with various employees, management and principals. In addition, Movants have found that the Admission Request requires an attempt to corroborate facts presented to Movants by the Bureau for the first time. Further, a response to the Admissions requires reference to company records, some of which are not readily available.

Further, key employees are currently out of the country due to longstanding plans and are not available to assist counsel in a response. Movants also believe they will be better able to respond once records are received due from their outstanding request for records pursuant to the Freedom of Information Act ("FOIA") filed with the Commission on May 19, 2003.

Pursuant to the Commission's Rules, 47 C.F.R. §. 1.46(c), Bureau Counsel has been notified of this motion and request. Counsel for the other respondents consents to grant this motion.

For the foregoing reasons, Movants should be granted an extension of time of 30 additional days to respond to the Admissions. By our calculation, that response date would be July 11, 2003.

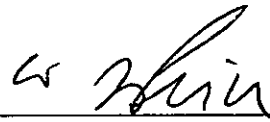
Respectfully submitted,

Counsel for

Affinity Network, Inc.  
NOSVA Limited Partnership

and

the Principals of  
NOS Communications, Inc.  
Affinity Network, Inc., and  
NOSVA Limited Partnership



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June 4, 2003

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CERTIFICATE OF SERVICE

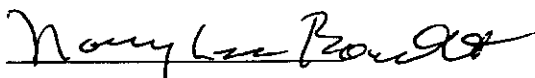
I, Nancy Boudrot, do hereby certify that on this 4<sup>th</sup> day of June, 2003, a copy of the foregoing "Motion for Extension of Time to Respond to Admissions Request" was hand delivered (except where noted) to the parties listed below.

Honorable Arthur I. Steinberg  
Administrative Law Judge  
Federal Communications Commission  
Washington, D.C. 20554  
(By facsimile (202) 418-0195)

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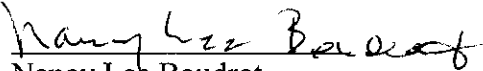
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Nancy Lee Boudrot

CERTIFICATE OF SERVICE

I, Nancy Boudrot, do hereby certify that on this 6<sup>th</sup> day of June, 2003, a copy of the foregoing "Motion for Extension of Time to Respond to Admissions Request" was hand delivered (except where noted) to the parties listed below.

Marlene H. Dortch, Secretary  
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Nancy Lee Boudrot